

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-11935DPW

SHEILA J. PORTER,

Plaintiff,

v.

ANDREA CABRAL, SUFFOLK
COUNTY SHERIFF'S DEPARTMENT,
SUFFOLK COUNTY, and
CORRECTIONAL MEDICAL
SERVICES, INC.,

Defendants.

**DEFENDANT CORRECTIONAL MEDICAL SERVICES, INC.'S MOTION FOR
SUMMARY JUDGMENT**

The defendant, Correctional Medical Services ("CMS"), hereby moves for summary judgment on all counts of the plaintiff's complaint against it. The plaintiff, Sheila Porter, alleges that CMS terminated her in breach of her employment contract with CMS and CMS' contract with defendant Suffolk County for the provision of inmate healthcare services, and in violation of her federal and state constitutional rights. She seeks redress from CMS under the Federal and Massachusetts Civil Rights Acts - 42 U.S.C § 1983 (Count I) and M.G.L. c. 12 § 11H and 11I (Count VII) - and for CMS' breaches of contract (Counts IV and V), termination in violation of public policy (Count VI), and intentional infliction of emotional distress (Count VIII). CMS contends that there is no genuine issue of material fact as to any of the claims against it and that

CMS is entitled to summary judgment as a matter of law. In further support of its motion, CMS relies upon other pleadings and exhibits filed contemporaneously with this motion.

The Defendant,
CORRECTIONAL MEDICAL
SERVICES, INC.,
By its attorneys,

/s/ Alexandra B. Harvey
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